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VIA ECF

The Hon. Anne Y. Shields
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

The application is granted. The Clerk of the Court is directed to consolidate the cases under 15-4394 and mark 17-3185 as closed.
So ordered.

Re: Anthony Tanza, et al. v. Garda CL Atlantic, Inc.
Docket Numbers: 2:15-cv-04394 & 2:17-cv-03185..

s/ Joan M. Azrack

6/26/18

Dear Judge Shields:

We represent defendant Garda CL Atlantic, Inc. ("Garda") in both of the above-referenced matters, which involve the same parties and counsel. We write jointly with counsel for plaintiffs Jimmy Adkins, Michael Boneta, Lana Bongiovi, Michael S. Bosman, Alexander Cioffi, Dennis J. Delucie, Barry Dubrow, Robert T. Giani, James R. Hetti, Charles Ingel, Dieter Kern, William R. Shannon, Gary E. Sobek, Carmela A. Syzmanski, Anthony Tanza, and Albert Velasquez (collectively, the "Represented Plaintiffs") (Garda and the Represented Plaintiffs together, the "Parties") to request that Case No. 2:17-cv-03185 (asserting a claim under New York's WARN law) be consolidated with an earlier-filed case, Case No. 2:15-cv-04394 (asserting a claim under the federal WARN Act). The Parties have globally settled the actions and, for purposes of judicial economy, would like to have their settlement approved in one single, consolidated action. The Parties therefore respectfully request that the Court consolidate these actions for purposes of approving the Parties' settlement.

Thank you for your consideration in this matter.

Respectfully submitted,

AKERMAN LLP

/s/ Samantha Abeysekera
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